



Gideon Orion Oliver

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501
New York, NY 10007

1825 Foster Avenue, Suite 1K
Brooklyn, NY 11230

Gideon@GideonLaw.com*

GideonLaw.com

Office: (718) 783-3682

Signal: (646) 263-3495

Fax: (646) 349-2914*

SO ORDERED.

Jennifer Rochon
JENNIFER L. ROCHON

United States District Judge

*Not for service

November 19, 2024

BY ECF

Hon. Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

The request for an extension to serve is GRANTED. The Court finds that Plaintiff has demonstrated "good cause" for an extension of the deadline for service set by Federal Rule of Civil Procedure 4(m). See *Alexander v. Saul*, 5 F.4th 139, 154 (2d Cir. 2021). Plaintiff served the City and named individual defendants within the 90-day period and has requested addresses for John Doe defendants. Plaintiff also moved diligently for an extension before the expiration of the initial 90-day period. See Fed. R. Civ. P. 6(b)(1)(A). The Court will extend the deadline for service to January 20, 2025.

Re: *Guerrero-Tabares v. City of New York, et. al.*, 24-cv-6361 (JLR) Date: November 20, 2024
New York, NY

Dear Judge Rochon:

I am co-counsel for Plaintiff in the case above. The complaint, initially filed on August 23, 2024, names four "John Doe" defendants – "First Name Unknown" Black and "John Does" 1-3 – collectively, the "Doe Defendants." See ECF 4 (the "Complaint"). The time to serve the Defendants will run in the next few days. I have asked counsel for Defendant City of New York to identify, and provide service information for, the Doe Defendants. However, such discovery in the case is stayed pursuant to Local Civil Rule 83.10 (the "1983 Plan"), as the Court is aware. See, e.g., ECF 11 (denying Plaintiff's application to remove the case from the 1983 Plan).

I respectfully submit that those circumstances constitute good cause within the meaning of Fed.R.Civ.P. 4(m) to extend the deadline within which to serve the Doe Defendants. Therefore, pursuant to Fed.R.Civ.P. 4(m), I ask that the Court extend the time to serve the Doe Defendants until 90 days after the Doe Defendants are identified and proper service information is provided, or until such time after the Doe Defendants are identified as the Court deems just and proper.

There has been no prior application to extend the deadline. Counsel for Defendant City of New York take no position as to this application as the Law Department does not currently represent the Doe Defendants.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver